

FILED

June 1, 2022

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: RG
Deputy

Case No: SA:22-CR-00277-OLG

UNITED STATES OF AMERICA

Plaintiff

v

TONY TREVON EVANS

Defendant

INDICTMENT

COUNTS 1-3: 18 U.S.C. § 2114(a)

Robbery of Mail, Money, or Property of the
United States

COUNT 4-5: 18 U.S.C. § 924(c)

Brandishing a Firearm During and in Relation
to a Crime of Violence

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 2114(a)]

On or about July 27, 2021, in the Western District of Texas, Defendant,

TONY TREVON EVANS,

did assault and rob R.V., a person having lawful charge, custody, and control of United States mail matter, money and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, in violation of Title 18, United States Code, Section 2114(a).

COUNT TWO

[18 U.S.C. § 2114(a)]

On or about August 25, 2021, in the Western District of Texas, Defendant,

TONY TREVON EVANS,

did assault and rob D.C., a person having lawful charge, custody, and control of United States mail matter, money and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, and did put the life of D.C. in jeopardy by the use of a dangerous weapon, to wit, a firearm, in violation of Title 18, United States Code, Section 2114(a).

COUNT THREE
[18 U.S.C. § 2114(a)]

On or about April 19, 2022, in the Western District of Texas, Defendant,

TONY TREVON EVANS,

did assault and rob S.T., a person having lawful charge, custody, and control of United States mail matter, money and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, and did put the life of S.T. in jeopardy by the use of a dangerous weapon, to wit, a firearm, in violation of Title 18, United States Code, Section 2114(a).

COUNT FOUR
[18 U.S.C. § 924(c)]

On or about August 25, 2021, in the Western District of Texas, Defendant,

TONY TREVON EVANS

did knowingly brandish a firearm during and in relation to a crime of violence that may be prosecuted in a court of the United States, that is, Robbery of Mail, Money, or Other Property of the United States, in violation of Title 18, United States Code, Sections 2114(a), as further described in Count Two, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FIVE
[18 U.S.C. § 924(c)]

On or about April 19, 2022, in the Western District of Texas, Defendant,

TONY TREVON EVANS,

did knowingly brandish a firearm during and in relation to a crime of violence that may be prosecuted in a court of the United States, that is, Robbery of Mail, Money, or Other Property of the United States, in violation of Title 18, United States Code, Sections 2114(a), as further described in Count Three, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Postal Robbery Violation and Forfeiture Statutes

**[Title 18 U.S.C. § 2114(a), subject to forfeiture pursuant to Title 18 U.S.C. § 981(a)(1)(C),
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the foregoing criminal violation set forth in Counts One through Three, the United States of America gives notice to Defendant **TONY TREVON EVANS** of its intent to seek the forfeiture of certain property upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 981(a)(1)(C), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 18 U.S.C. § 981. Civil forfeiture

(a) (1) The following property is subject to forfeiture to the United States:

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

II.

Firearm Violations and Forfeiture Statutes

**[Title 18 U.S.C. § 924(c), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made
applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violations set forth in Counts Four and Five, the United States of America gives notice to Defendant **TONY TREVON EVANS** of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of . . . of section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following property:

1. \$5,362.00 More or Less in United States Currency;
2. Romarm Draco AK-47 Rifle, Cal .762, SN: 21DG-3103; and
3. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

III.

Money Judgment

Money Judgment: A sum of money representing the amount of proceeds traceable to the violations for which Defendant **TONY TREVON EVANS** is liable.

IV.

Substitute Assets

If any property subject to forfeiture as a result of the offense(s) set forth in the Counts listed above;

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party ;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

as a result of any act or omission of the Defendant, **TONY TREVON EVANS**, it is the intent of the United States of America, to seek forfeiture of any other property of said Defendant, up to the value of the property listed above as being subject to forfeiture pursuant to Title 21 U.S.C. § 853(p) and Fed. R. Crim. P. 32.2(e)(1).

A TRUE BILL


FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY:



FOR WILLIAM F. CALVE
Assistant United States Attorney